

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

BRYAN JAY GEESEY

Debtor(s)

CHAPTER 13

CASE NO. 1:12-00452-RNO

AMENDED MOTION TO AUTHORIZE WAGE ATTACHMENT

COME NOW, the Debtor, Bryan Geesey, by and through counsel, Dawn M. Cutaia, and respectfully represent:

1. The Debtor filed a Chapter 13 Petition on January 27, 2012.
2. The Debtor, Bryan Geesey, receives regular unemployment income through Johnson Controls which may be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
3. A wage attachment order was entered on August 2, 2013 and modified on March 19, 2014.
4. Debtor's Plan payment includes a conduit payment, but the Trustee's office has informed Debtor he needs to make his mortgage payments on his own.
5. As such, Debtor is seeking to amend his wage attachment to remove the conduit payment, because Debtor cannot afford to pay his mortgage otherwise/
6. The Debtor consents to the wage attachment, as amended.

WHEREFORE, the Debtor respectfully requests this Court enter an Order directing the above-mentioned employer to Pay Trustee in the amount set forth in the attached Order.

Respectfully Submitted,

By: /s/ Dawn M. Cutaia

Dawn M. Cutaia

Supreme Court ID 77965

Attorney for Debtor

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ORDER TO PAY TRUSTEE

AND NOW, upon consideration of the above-referenced Debtor having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS HEREBY ORDERED that until further Order of this Court:

Employer: Johnson Controls, Inc.
ATTN: Diane Daumler
575 N. Green Bay Ave (x-90)
Milwaukee, WI 53209

Shall deduct from Bryan Geesey's compensation the sum of \$93.69 per weekly pay, for a total of \$406 per month, beginning on the first pay after receipt of this Order, and deduct this same amount each pay thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor and remit the deducted sums to:

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
PO Box 7005
Lancaster, PA 17604

IT IS FURTHER ORDERED that checks issued to the Trustee pursuant to this Order shall include the above-captioned case number on the face of the check.

By the Court